



**Kenneth M. Abell**  
(646) 970-7341 (direct dial)  
[kabell@aellaw.com](mailto:kabell@aellaw.com)

488 Madison Avenue, 23rd Fl.  
New York, NY 10022  
(646) 970-7340 (p)  
(646) 970-7345 (f)  
[www.aellaw.com](http://www.aellaw.com)

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**By ECF**

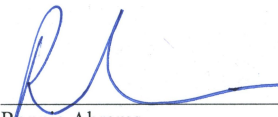
Honorable Ronnie Abrams  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2203  
New York, NY 10007

Re: United States v. Feng Qin, 18 Cr. 854 (RA)

Dear Judge Abrams:

Application granted. The trial date of April 6, 2020 is adjourned until further notice. A status conference is scheduled for May 1, 2020 at 12:00 p.m. to discuss the status of the case and scheduling. Time is excluded to May 1, 2020, under the Speedy Trial Act, pursuant to 18 U.S.C., Section 3161(h)(7)(A).

SO ORDERED.

  
Ronnie Abrams  
United States District Judge 3/3/20

We write in connection with the above-referenced matter, which is currently scheduled for trial on April 6, 2020. We write to respectfully request, with the Government's consent, an adjournment of the trial date for the reasons set forth below.

The first and primary reason for this adjournment request is that defendant Qin's long-standing counsel, Mark Furman, has recently undergone a series of cardiac procedures that will prevent him from proceeding as lead counsel in this matter. In light of Mr. Furman's serious medical condition, the undersigned recently took over as lead counsel for Dr. Qin, and have been corresponding with the Government about this matter. As the Court is likely aware, adequate representation of Dr. Qin in this matter entails, among other things, the review of voluminous medical and billing records and expert reports. Given our recent addition as counsel, it would be exceedingly difficult for us to be ready for trial starting early next month.

Second, during the course of recent conversations with the Government, it has come to our attention that the Government does not have certain images from the medical procedures at issue in this case. We believe those images are critically important to this matter and we will soon be making a full production of those images to the Government.

Finally, although we have just recently been added as counsel in this matter, we have commenced a dialogue with the Government about an alternative resolution of the charges in the indictment that would obviate the need for a trial. In connection with that discussion, we have provided a significant amount of material to the Government – including three lengthy expert reports – which the Government is in the process of reviewing. We think it would be beneficial to all involved to allow the Government adequate time to review the recently produced materials.

Accordingly, for the foregoing reasons, we respectfully request that the Court adjourn the trial currently scheduled for April 6 and schedule a status conference for late April, at which time the parties can report to the Court on the status of their discussions and schedule a new trial date should that prove necessary. Additionally, if the Court is amenable to the requested adjournment, we also respectfully request, with the Government's consent, an Order excluding time under the Speedy Trial Act through the date of the status conference in connection with this matter.

We thank the Court for its consideration of this request.

Respectfully submitted,

Abell Eskew Landau LLP

By: /s/ *Kenneth M. Abell*  
Kenneth M. Abell  
David M. Eskew

Cc: AUSAs Barnea, Li and Krouse